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Serial No. 10/509,286
Atty. Doc. No. 2002P05160WOUS**REMARKS**

Claims 20, 22, 23 and 38 have been amended, claims 36 and 37 have been canceled, and new claims 39-41 have been added. Thus, claims 20-35 and 38-41 are currently pending and presented for examination. Applicant respectfully requests reconsideration and allowance of the pending claims view of the foregoing amendments and the following remarks.

Response to Objections to the Specification:

The Examiner has objected to the abstract for including phrases that can be implied. Applicant has removed such phrases from the abstract and respectfully requests the Examiner to withdraw the objections.

Response to Rejections Under Section 103:

Claims 20-38 stand rejected under 35 U.S.C § 103(a) as being obvious over Sitaraman et al. (USPN 6,427,170) in view of Droms "DHCP Failover Protocol".

Applicant's Claim 20 recites:

determining further subsets of the address pool assigned to the first AAA server, wherein the further subsets are determined according to the estimation; and including the determined further subsets in the updating message in order to inform the other AAA servers which logical address could be used by the first AAA server between a next time period

Applicant's estimating how many logical IP address issuable between the messages and further informing the other AAA servers which address could be chosen (via the determined subsets) facilitates allowing the other AAA servers to know which address to mark uncertain in case of a failover.

The Examiner contends that Droms teaches these limitations. However, Droms teaches organizing addresses associated with a particular network number and subnet mask into a subnet address pool and a time synchronize between the servers. Droms' subnet address pool is determined according information in an IP address (IP format includes the network number based on the submask) and not to the estimation described above. Furthermore, Droms' time synchronization between the servers provides a way to determine a delta time between the

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servers by tagging received messages with a time value and not including the determined further subsets in the updating message.

Applicant's Claim 20 also recites:

estimating a number of logical addresses issuable by the first AAA server in a time period between the updating message to be sent and a next-following updating message

The Examiner contends that Sitaraman teaches this limitation. However, Sitaraman teaches publishing allocation events that have occurred in the past. Publishing past events is contrary to Applicant's estimating a number of a future issuable logical addresses (between the time period of the updating message to be sent and a next update message in the future).

The following is a quotation from MPEP 2143

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

Thus, the combination of Sitaraman and Droms does not teach or suggest all the limitations to Applicant's claim 20. In view of the above, Applicant respectfully submits that claim 20 is patentable. Furthermore, Claims 21-35 which depend on claim 20 are also patentable at least based on their dependence from claim 20 as well as based on their own merits.

Applicant's Claim 38 recites:

at least three AAA servers for administrating the pool of logical addresses such that each of the servers provides redundancy to each other; and

In contrast, Droms teaches "The following are explicit limitations of this protocol...This protocol provides only one level of redundancy through a single secondary server for each primary server" (page 16, section 4.2) Although Droms' primary and secondary servers may load share, the DHCP Failover Protocol limits the sharing, therefore redundancy, between the primary

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and a secondary server. Thus Droms teaches away from having at least three AAA servers each providing redundancy to each other. Therefore, the combination of Sitaraman and Droms does not teach or suggest all the limitations to Applicant's claim 38. In view of the above, Applicant respectfully submits that claim 38 is patentable.

New Claims:

New claims further define the scope of the invention as described in the specification and drawings. In view of the foregoing remarks regarding the other claims, Applicant respectfully submits claims 39-41 are patentable and requests allowance of claims 39-41.

Conclusion

For the foregoing reasons, it is respectfully submitted that the objections and rejections set forth in the outstanding Office Action are inapplicable to the present claims. All correspondence should continue to be directed to our below-listed address. Accordingly, Applicant respectfully requests that the Examiner reconsider the objections and rejections and timely pass the application to allowance. Please grant any extensions of time required to enter this paper. The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including fees for additional claims and terminal disclaimer fee, or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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